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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14
15 SASA MASLIC, et al.,

Case No. 5:21-cv-02556-BLF-SVK

16 Plaintiffs,

17 vs.

18 ISM VUZEM D.O.O., et al.,

**SUPPLEMENTAL STATEMENT OF
DEFENDANT TESLA, INC.
FOLLOWING APRIL 23, 2024
HEARING ON JOINT DISCOVERY
STATEMENT**

19 Defendants.

20 Re: Dkt. Nos. 129 & 131

1 Defendant Tesla, Inc. responds to the Court's April 23, 2024 Order (Dkt. No. 129) and to
 2 the April 25, 2023 Order/Clerk's Notice (Dkt. No. 131) as follows:

3 **1.a. Lenel Database**

4 As stated in Tesla's first report on this subject (Dkt. No. 130), undersigned counsel had
 5 contacted a regional manager for Lenel via email and telephone in search of assistance with
 6 accessing the database. On Friday, April 26, Tesla received confirmation that the regional manager
 7 had received counsel's inquiries and a promise that other Lenel personnel would follow up with
 8 counsel for Tesla with more details regarding access to the database in question. Later on Friday
 9 afternoon, the undersigned received an email from Steven L. Partridge, the Vice President of Sales
 10 for the United States and Canada for Lenel. Mr. Partridge confirmed that the Tesla database in
 11 question is not stored by Lenel, nor does Lenel have remote access to the database. Mr. Partridge
 12 further indicated that Northland Controls, Lenel's "integrator-partner" that services Tesla's
 13 account, provides services for the relevant system or program through which the Tesla database is
 14 stored. Mr. Partridge also offered to connect the undersigned with Northland Controls.
 15 Undersigned counsel responded to Mr. Partridge's email within a few hours of its receipt on April
 16 26, seeking a contact at Northland Controls for assistance with accessing the database, and it is
 17 hoped that Northland Controls may have software or another system that can facilitate Tesla's
 18 access to the database in question. Undersigned counsel then followed up with Mr. Partridge and
 19 other Lenel personnel on the morning of April 29, but has not received a further response from
 20 Lenel or the promised contact with Northland Controls. On April 29, undersigned counsel called
 21 and emailed Northland Controls' general customer service contacts but was unable to reach an
 22 agent for assistance or receive a response as of the filing of this report.

23 Tesla appreciates the patience of both the Court and opposing counsel as it works to obtain
 24 access to the database formerly believed to be controlled by Lenel and now believed to be accessed
 25 through Northland Controls. In light of the foregoing, Tesla respectfully proposes that it continue
 26 to contact all available persons at Lenel and Northland Controls and provide a further update to
 27 the Court by 2 p.m. P.D.T. on May 1, 2024.

1 Dated: April 29, 2024

Respectfully submitted,

2 By: /s/ Aaron M. Bernay

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16 **CERTIFICATE OF SERVICE**

17 Pursuant to Civil L.R. 5-5(a), I, Aaron M. Bernay, hereby certify that the foregoing has
18 been filed with the Court via the CM/ECF system, which will send notice of this filing to all
19 registered users in this case.

20
21 Dated: April 29, 2024

/s/ Aaron M. Bernay

22 Aaron M. Bernay
Counsel for Defendant Tesla, Inc.

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